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*Co-Lead Counsel for Plaintiffs and the Class*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, Brandon  
Vera, Luis Javier Vazquez, and Kyle  
Kingsbury, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

Defendants.

No.: 2:15-cv-01045-RFB-BNW

**DECLARATION OF ERIC L. CRAMER  
IN SUPPORT OF PLAINTIFFS'  
CONSOLIDATED RESPONSE TO  
DEFENDANT ZUFFA'S MOTION TO  
REOPEN DISCOVERY (ECF NO. 884)  
AND MOTION TO TREAT FACT  
EVIDENCE PRODUCED IN *JOHNSON*  
LITIGATION AS IF IT WAS ALSO  
PRODUCED IN *LE* LITIGATION (ECF  
NO. 885)**

Kajan Johnson and Clarence Dollaway, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

vs.

Zuffa, LLC (d/b/a Ultimate Fighting  
Championship and UFC) and Endeavor  
Group Holdings, Inc.,

Defendants

No.: 2:21-cv-1189-RFB BNW

Case Nos.: 2:15-cv-1045; 2:21-cv-01189

DECLARATION OF ERIC L. CRAMER IN SUPPORT OF PLAINTIFFS' CONSOLIDATED  
RESPONSE TO DEFENDANT ZUFFA'S MOTION TO REOPEN DISCOVERY (ECF NO.  
884) AND MOTION TO TREAT FACT EVIDENCE PRODUCED IN *JOHNSON* LITIGATION  
AS IF IT WAS ALSO PRODUCED IN *LE* LITIGATION (ECF NO. 885)

1 I, Eric L. Cramer, declare as follows:

2 1. I am Chairman of the law firm of Berger Montague PC, one of the Court  
3 appointed Co-Lead Class Counsel to represent the Bout Class in *Le v. Zuffa, LLC*, No. 2:15-cv-  
4 1045 (D. Nev.), and counsel for the individual and representative plaintiffs in that action (as well  
5 as counsel for the individual and representative plaintiffs in *Johnson v. Zuffa, LLC*, No. 2:21-cv-  
6 1189 (D. Nev.)). I am a member in good standing of the State Bars of Pennsylvania and New  
7 York, and have been admitted pro hac vice in this Court. I am over 18 years of age and have  
8 personal knowledge of the facts stated in this Declaration. If called as a witness, I could and  
9 would testify competently to them.

10 2. I make this Declaration in support of Plaintiffs' Consolidated Response to  
11 Defendant Zuffa's Motion to Reopen Discovery (ECF No. 884) and Motion to Treat Fact  
12 Evidence Produced in Johnson Litigation as if it was also Produced in Le Litigation (ECF No.  
13 885) ("Consolidated Response").

14 3. Attached as Exhibit 1 is a true and correct copy of the Declaration of Hal J.  
15 Singer, Ph.D., dated November 13, 2023 (referred to in Plaintiffs' Consolidated Response as  
16 "Singer Decl.>").

17  
18 I declare under penalty of perjury under the laws of the United States that the foregoing is  
19 true and correct. Executed on this 13<sup>th</sup> day of November, 2023, in Philadelphia, PA.

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21  
22 /s/Eric L. Cramer